

United States District Court

RDW
RECEIVED

MAR 09 2012

SOUTHERN

DISTRICT OF

IOWA

CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

RYAN ANDREW LARSON

CASE NUMBER: 3:12-mj- 34

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

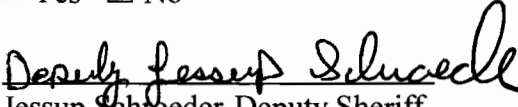
COUNT 1 (Coercion and Enticement)

That beginning on or about February 13, 2012, and continuing until on or about February 16, 2012, in the Southern District of Iowa and elsewhere, the defendant, RYAN ANDREW LARSON, did attempt to use facilities of interstate and foreign commerce, that is, the Internet, cable systems, and telephone systems, to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, that is, a 13-year old girl, to engage in sexual activities for which a person could be charged with criminal offenses. This is a violation of Title 18, United States Code, Section 2422(b).

I further state that I am a(n) Clinton County Sheriff's Office-Deputy Sheriff and that this Complaint is based on the following facts:

See Affidavit attached and incorporated hereto.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

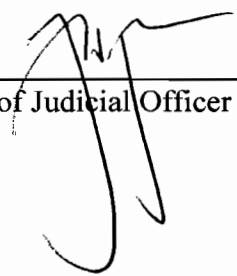

Jessup Schroeder-Deputy Sheriff
Clinton County Sheriff's Office

Sworn to before me and subscribed in my presence,

March 9, 2012 at
Date

Davenport, Iowa
City and State

Thomas J. Shields, U.S. Chief Magistrate Judge
Southern District of Iowa
Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

I, Jessup Schroeder, being duly sworn state and depose as follows:

1. I am a deputy sheriff with the Clinton County Iowa Sheriff's Office and have been continuously so employed since September of 1995. I am also an investigator with the Iowa Internet Crimes Against Children Task Force (ICAC) and have been so since April of 2007. ICAC is a task force of local, state, and federal law enforcement agencies in Iowa that investigate the sexual exploitation of children by use of the internet. I have received cyber-crimes training from the United States Department of Justice Office of Juvenile Justice and Delinquency Prevention. Affiant is aware of the information set forth below through personal investigation, interviews, and discussions with other law enforcement officers. This investigation concerns the attempted enticement of one person that Ryan Andrew Larson perceived to be a 13-year-old female for the purpose of engaging in sexual intercourse. The planning for this meeting is evidenced by Internet conversations known as chats between February 13, 2012 and February 16, 2012, which indicated Ryan Andrew Larson believed the 13-year-old female was available and willing to engage in sexual intercourse with him. Ryan Andrew Larson used the Yahoo! screen name *randrew1282*. Ryan Andrew Larson stated in the chat messages and cellular telephone text messages he intended to travel to Clinton, Iowa to meet the 13-year-old female, take her to a hotel in Illinois, and engage in sexual activity with her. Had Ryan Andrew Larson carried through with engaging in sexual activity with a 13-year-old girl in Illinois, he would have been in violation of Illinois statute 720 ILCS 5-11-1.20, Criminal Sexual Assault, a Class 1 Felony.

INVESTIGATION DETAILS:

2. On Monday, February 13, 2012, your affiant was logged into an undercover Yahoo Instant Messenger account. Your affiant was acting undercover as Amber, a 13-year-old girl from Clinton, Iowa. Amber's screen name was "amber_shippler_13". I was acting on behalf of the Iowa Internet Crimes Against Children (ICAC) Task Force.

3. Your affiant was using a computer dedicated for Internet Crimes Against Children investigations located at the Clinton County Sheriff's Office located in Clinton, Iowa and in the Southern District of Iowa.

4. The "Save Conversation" feature of Yahoo Instant Messenger was turned on and all chats were saved. Below are excerpts from the chat log that relate to the identity of the suspect, the age of Amber, and probable cause for the violation of Title 18, United States Code, Section 2422(b).

Suspect makes contact with Amber:

5. On February 13th, at or about 3:28 p.m. Central Time your affiant was entered into an Iowa Romance chat room within the Yahoo Instant Messenger system. The user of the Yahoo Instant Messenger screen name "randrew1282" initiated a private one-to-one chat conversation with Amber by saying "hi". The user immediately asked Amber her age to which she said "13". The user stated he was "29":

3:28:09 PM
randrew1282: hi
3:28:19 PM
amber_shippler_13: hi
3:28:25 PM
randrew1282: asl?
3:28:56 PM
amber_shippler_13: 13f clinton
3:29:08 PM
randrew1282: 29/m/moline sorry

Web Cam Session on 2-13-2012:

6. At 3:49 p.m., 21 minutes into the chat conversation, the user asked Amber if she wanted to see his penis on his web cam. The user showed his face on the web cam. The user was a white male with glasses on. The user then stood up and showed his erect penis on the web cam. The web cam session was video recorded using screen capture software for evidentiary purposes.

2-13-2012 chat continued:

7. The user asked Amber if she had pubic hair yet and if she was going to shave it:

3:50:28 PM
randrew1282: can i ask if u have hair down there?
3:50:33 PM
amber_shippler_13: a lil
3:50:35 PM amber_shippler_13: not much
3:50:47 PM
randrew1282: u gonna shave it?
3:50:56 PM
amber_shippler_13: idk
3:50:58 PM
amber_shippler_13: lol
3:51:08 PM
randrew1282: guys like shaved....

3:51:12 PM

amber_shippler_13: k

3:51:31 PM

amber_shippler_13: i nev shaved there

3:51:39 PM

randrew1282: at least i do.....nice when a guys goes to eat a girl out

8. The suspect asked Amber if she was ready to lose her virginity and said he could help her out with that. The suspect stated he would digitally penetrate Amber's vagina and lick it before having vaginal intercourse with her:

4:00:06 PM

randrew1282: i say too bad ur not 18 cause i am only 50 miles from ya

4:00:17 PM

amber_shippler_13: ya way close

4:00:22 PM

randrew1282: ya

4:00:32 PM

randrew1282: grandma work?

4:00:46 PM

amber_shippler_13: ya she is now

4:01:03 PM

randrew1282: ahh.....no grandpa?

4:01:06 PM

amber_shippler_13: no

4:01:29 PM

randrew1282: ahh i could come over too if u were 18....lol

4:01:35 PM

amber_shippler_13: lol yep

4:02:03 PM

randrew1282: would u be rdy to loss virginity?

4:02:14 PM

amber_shippler_13:

4:02:17 PM

amber_shippler_13: prob

4:02:31 PM

randrew1282: prob?.....

4:02:46 PM

amber_shippler_13: ya id b kool

4:03:08 PM

randrew1282: i would love to help ya out there.....

4:03:15 PM

amber_shippler_13: u woud?

4:03:22 PM
randrew1282: sure
4:03:25 PM
amber_shippler_13: o wow
4:03:52 PM
randrew1282: i would finger u first thou.....
4:04:00 PM
amber_shippler_13: duz it hurt 1st time??
4:04:25 PM
randrew1282: sometimes...depends how rough ur first is too ya
4:04:30 PM
amber_shippler_13: k
4:05:26 PM
randrew1282: i would finger ur pussy and lick it with my tongue before i stuck my dick in it
4:05:31 PM
amber_shippler_13: k
4:05:36 PM
amber_shippler_13: thx

9. The suspect stated he was concerned about getting caught with a minor. He said he could maybe meet Amber on Thursday, after they talked all week.

4:08:11 PM
randrew1282: lol.....io just dont trust the whole minor getting caught thing now a days
4:08:17 PM
amber_shippler_13: oh
4:09:24 PM
randrew1282: make sence
4:09:32 PM
amber_shippler_13: ya
4:09:48 PM
randrew1282: otherwise i would come over
4:09:52 PM
amber_shippler_13: kool
4:09:54 PM
amber_shippler_13: it ok
4:10:36 PM
randrew1282: maybe if we talk all week...thursday i may if u wanted
4:10:42 PM
amber_shippler_13: ya sure
4:10:58 PM
amber_shippler_13:

4:11:20 PM

randrew1282: ur grandma work thursday?

2-13-2012: Suspect identified as Ryan Andrew Larson:

10. On February 13, 2012; your affiant searched Facebook (www.facebook.com) using the email address randrew1982@yahoo.com. Facebook showed that email address belonged to a Ryan Larson from Cozad, Nebraska. The Facebook profile had a photograph of a white male who was the same male the affiant saw on the Yahoo web cam session earlier.

11. The Facebook profile indicated Larson worked for Tyson Foods. Larson stated in chat he worked for Tyson Foods. Tyson also indicated he was currently driving a white Ford Taurus with a Tyson logo on the side of the vehicle.

Chat continues on 2-14-2012:

12. On Tuesday, February 14, 2012 Larson, still using the screen name randrew1282, initiated a private one-to-one instant message conversation with Amber by saying "hi".

13. Larson stated he was going to eat a meal at Applebee's and the only thing better would be 'eating' Amber's 'pussy':

7:12:49 PM

randrew1282: I am thinking about going to applebees

7:13:02 PM

amber_shippler_13: o yummy i <3 it ther

7:13:29 PM

randrew1282: lol.....I like it too

7:13:37 PM

amber_shippler_13:

7:13:39 PM

amber_shippler_13: kool

7:14:15 PM

randrew1282: only thing better would be eating your pussy...lol...j/k

Chat continues on 2-15-2012:

14. On February 15, 2012 Larson initiated a private one-to-one instant message conversation with Amber by saying "hey you"

Text message conversation on 2-16-2012:

15. On February 16, 2012 at or about 3:16 p.m. your affiant, acting as Amber, sent Larson a text message that said "wats up?".

Me: wats up? 3:16 PM
+13087463595: Nothin....u? 3:31 PM
+13087463595: About to leave work 3:31 PM
Me: kool...just chilin @home 3:34 PM

16. Larson asked Amber if anything cool was going on. Larson asked Amber if she had plans for the night. Larson asked Amber if she wanted to do something. Larson then asked Amber to send him an instant message on Yahoo Instant Messenger to his screen name randrew1282:

+13087463595: Anything kool going on? 3:55 PM
Me: no...u doin anythin? 3:56 PM
+13087463595: Workin right now...plans for tonight? 4:01 PM
+13087463595: U bored? 5:20 PM
Me: no plans...ya 5:36 PM
+13087463595: Did ya wanna do something? 5:41 PM
+13087463595: Hey at home...wanna send ur pic please 5:57 PM
Me: sure wat u wanna do? 6:29 PM
+13087463595: Send me a message on yahoo. Randrew1282 6:30 PM
Me: k 6:33 PM

Conversation moves from cell phone text messages to Yahoo Instant Messenger on 2-16-2012:

17. At 6:38 p.m., at the request of Larson, the conversation moved to Yahoo Instant Messenger.

18. Larson asked Amber if he could come and get her and then they could take a dip in the hot tub. Larson then asked Amber if she wanted to have fun in the room after. Larson then clarified by saying he could eat Amber's 'pussy'. Larson asked Amber where he could pick her up to which Amber said the Jewell Osco store:

6:39:52 PM
randrew1282: so wanna me to come get ya ...we can take dip in hot tub?
6:40:03 PM
amber_shippler_13: ya sure
6:40:37 PM
randrew1282: need place to pick u up?
6:40:54 PM

amber_shippler_13: hot tub ther?
6:41:14 PM
randrew1282: staying hotel atm
6:41:24 PM
amber_shippler_13: atm??
6:41:32 PM
randrew1282: at the moment
6:41:34 PM
amber_shippler_13: ohhh
6:41:37 PM
amber_shippler_13: lol
6:41:49 PM
amber_shippler_13: sound fun
6:42:00 PM
randrew1282: maybe fun in room after?
6:42:09 PM
amber_shippler_13: ya
6:42:13 PM
amber_shippler_13: like wat??
6:42:41 PM
randrew1282: let me eat ur pussy?
6:42:47 PM
amber_shippler_13: u wanna??
6:42:56 PM
randrew1282: if u want me too
6:43:02 PM
amber_shippler_13: k
6:43:23 PM
randrew1282: where do i need to met u to pick u up?
6:43:48 PM
amber_shippler_13: ummm
6:43:53 PM
amber_shippler_13: jewell osco?

19. Larson said it would take him awhile to get there. Arrangements were made to meet around 8:00 p.m. Larson said he would text Amber:

6:46:28 PM
randrew1282: ok will take me a little to get there
6:46:59 PM
amber_shippler_13: k i gota get ready...8??
6:47:14 PM
randrew1282: maybe sooner i text u

Ryan Larson Arrest:

20. At or about 7:55 p.m. the following officers deployed in the area of the Jewell Osco parking lot, located at 1307 North 2nd Street, Clinton, Iowa:

Deputy Jessup Schroeder
Reserve Deputy Shane Glew
Sgt Steve Cundiff
Deputy Rachelle Kunde (Scott County Sheriff's Office ICAC)

21. During the chat on Monday, February 13, 2012; Larson stated he was driving a company car, specifically a white Ford Taurus with the "Tyson" logo on it:

4:36:44 PM
randrew1282: i have company car...white ford taurus with tyson logo on it

22. At or about 8:15 p.m. Sgt Cundiff and Deputy Kunde observed a white Ford Taurus with a logo on the side doors driving northbound on North 2nd Street, south of Jewell Osco. The Taurus pulled into the Jewell Osco parking lot by way of the south entrance. The vehicle then backed into a parking spot on the south side of the parking lot by the Verizon Wireless store. The vehicle turned off its headlights.

23. Your affiant, acting as Amber, sent Larson a text message asking him where he parked. Larson responded that he parked by Verizon:

Me: wher u park @?? 8:16 PM
+13087463595: Back by verizon 8:17 PM

24. At or about 8:20 p.m. officers moved in on the white Taurus. The vehicle was occupied by the person. Your affiant recognized Ryan Andrew Larson, who was sitting in the driver's seat position. Larson was the lone occupant of the vehicle. Larson was holding his cell phone and your affiant ordered him to put it down, which he did. Larson was asked to step out of his vehicle. Your affiant searched Larson's person. Reserve Deputy Glew then handcuffed Larson behind his back and placed him in the backseat of my vehicle. Your affiant advised Larson he was under arrest for enticing away a minor.

25. Larson left his cell phone on the driver's seat of the vehicle when he exited the car. The cell phone was left in the vehicle when it was towed to the Sheriff's Office pending application of a search warrant.

26. From outside the vehicle your affiant could see a Global Positioning System (GPS) device on the front windshield of the car. During the text message conversation on February 16, 2012; Larson indicated he had a GPS device, but was having difficulty finding Jewell-Osco with it:

+13087463595: What street store on? 7:07 PM
+13087463595: I can't find that store on my gps 7:14 PM
Me: it like 2nd st n 13av i think 7:15 PM
+13087463595: U live in clinton ia right? 7:18 PM
Me: ya 7:26 PM

27. Sgt Steve Cundiff and Deputy Kunde inventoried the vehicle. The vehicle was towed from the parking lot to the Clinton County Sheriff's Office overhead garage and secured.

28. Larson was transported to the Sheriff's Office by Reserve Deputy Glew and your affiant.

Post arrest interview of Ryan Andrew Larson:

29. At or about 8:32 p.m. Detective Schroeder advised Larson of his rights pursuant to the *Miranda* warnings which he waived. Larson admitted to using the Yahoo screen name "randrew1282". Larson admitted to chatting with Amber. Larson admitted to having chats with Amber about meeting her in person and engaging in sex acts with her. Larson admitted that Amber indicated she was 13-years-old during their communications. Larson admitted to showing his penis to Amber on his web cam. Larson stated his personal email address is randrew1282@yahoo.com. Larson admitted to using his LG cell phone, phone number (308) 746-3595, to exchange text messages with Amber. Larson stated he chatted with Amber from his hotel room using his computer. Larson stated he was staying at The Comfort Inn hotel, room number 105, 2600 52nd Avenue, Moline Illinois. Larson provided consent to allow law enforcement officers to search his hotel room. Larson signed two consents, one specific to computers and the second was a general consent to search document.

30. Scott County Deputy Rachelle Kunde and Detective Schroeder went to The Comfort Inn, room number 105 in Moline, Illinois and searched the room. An Acer laptop computer, serial number LXR4G02060032555801601 was found and seized. A web cam was attached to the Acer laptop. Also seized was a Scandisk Cruzer 2 gigabyte thumb drive that was next to the Acer laptop. Two condoms were found inside a pocket of a coat that was in the room.

31. Had Ryan Andrew Larson carried through with engaging in sexual activity with a 13-year-old girl in Illinois, he would have been in violation of Illinois statute 720 ILCS 5-11-1.20, Criminal Sexual Assault, a Class 1 Felony. Under Illinois Code 720 s 5/11-1.20, a person commits criminal sexual assault as follows:

(a) A person commits criminal sexual assault if that person commits an act of sexual penetration and:

(1) uses force or threat of force;

(2) knows that the victim is unable to understand the nature of the act or is unable to give knowing consent;

(3) is a family member of the victim, and the victim is under 18 years of age; or

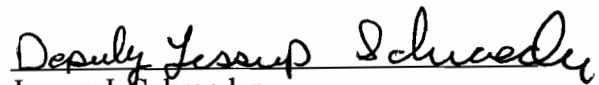
(4) is 17 years of age or over and holds a position of trust, authority, or supervision in relation to the victim, and the victim is at least 13 years of age but under 18 years of age.

Under Illinois Code 720 s5/11-0.1, "sexual penetration is defined as:

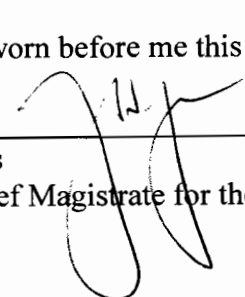
Sexual penetration" means any contact, however slight, between the sex organ or anus of one person and an object or the sex organ, mouth, or anus of another person, or any intrusion, however slight, of any part of the body of one person or of any animal or object into the sex organ or anus of another person, including, but not limited to, cunnilingus, fellatio, or anal penetration. Evidence of emission of semen is not required to prove sexual penetration.

CONCLUSION

32. Based on all the foregoing, Affiant has probable cause to believe that Ryan Andrew Larson, using a facility or means of interstate or foreign commerce, knowingly persuaded, induced, enticed, or coerced an individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, and attempted to do so, in violation of Title 18, United States Code, Section 2422(b). These violations having occurred within Clinton County Iowa, which is within the Southern District of Iowa.


Jessup J. Schroeder
Deputy Sheriff
Clinton County Sheriff's Office

Subscribed and sworn before me this 9th day of March, 2012.


Thomas J. Shields
United States Chief Magistrate for the Southern District of Iowa